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April 27, 2011

BY ECF AND FEDERAL EXPRESS:

Honorable Patty Shwartz, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
and U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: **Mallinckrodt Inc. v. Watson Laboratories, Inc. – Florida,
et al.
Civil Action No. 10 CV 6424 (FSH) (PS)**

Dear Judge Shwartz:

As Your Honor is aware, this firm represents Defendant Watson Laboratories, Inc. – Florida (“Watson Labs”) in the above-captioned matter. Pursuant to Your Honor’s direction, enclosed please find copies of the amended declarations of James S. Richter and James F. Hurst, which are being submitted in support of Mr. Hurst’s admission *pro hac vice*.

If the enclosed declarations are acceptable to Your Honor, we respectfully request that Watson Labs’ application be granted.

Respectfully submitted,



Jeffrey P. Catenacci

Encls.

cc: All Counsel (by ECF)

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James S. Richter
Jeffrey P. Catenacci

*Attorneys for Defendant/Counterclaim Plaintiff
Watson Laboratories, Inc. – Florida*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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MALLINCKRODT INC.,	:	Honorable Faith S. Hochberg, U.S.D.J.
	:	
Plaintiff,	:	Civil Action No. 10 CV 6424 (FSH) (PS)
	:	
v.	:	
WATSON LABORATORIES, INC. –	:	DECLARATION OF JAMES S. RICHTER IN
FLORIDA,	:	SUPPORT OF APPLICATION FOR
	:	ADMISSION OF COUNSEL <i>PRO HAC VICE</i>
	:	
Defendant.	:	
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JAMES S. RICHTER, of full age, hereby declares as follows:

1. I am an attorney at law of the State of New Jersey and a member of Winston & Strawn LLP, attorneys for Defendant Watson Laboratories, Inc. – Florida (“Watson Labs”).
2. This Declaration is submitted in support of Watson Labs’ application to admit James F. Hurst *pro hac vice* in this matter.
3. I am a member of Winston & Strawn’s Newark, New Jersey office and a member in good standing of the Bar of the Supreme Court of New Jersey and the Bar of the District Court

of New Jersey. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me, by any court in any jurisdiction.

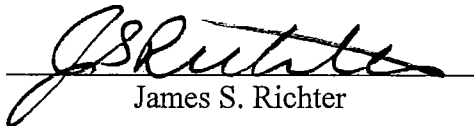
4. I, or other members of the New Jersey Bar and the Bar of the District Court of New Jersey who are employed in our Newark office, will sign all pleadings, briefs, and other papers filed with the Court and will be responsible for said papers and for the conduct of the case. Additionally, I, or other members of the New Jersey Bar and the Bar of the District Court of New Jersey who are employed in our Newark office, will be present before the Court during all phases of this proceeding and I will be responsible for the conduct of the attorneys admitted *pro hac vice*.

5. This firm agrees to abide by *L. Civ. R. 11.1* and 101.1(c) in filing pleadings, briefs, and other papers with the Court, and I will ensure that *pro hac vice* counsel complies with Rule 101.1(c).

6. Plaintiff's counsel has consented to this motion and the *pro hac vice* admission of counsel.

7. Pursuant to *L. Civ. R. 7.1(d)(4)*, no brief is necessary for this motion because all facts in support of this motion are set forth in the Declaration of James F. Hurst (which is submitted herewith), and there are no legal issues that must be briefed in connection with this motion.

I hereby declare under the penalty of perjury that the foregoing statements made by me are true and correct.


James S. Richter

Dated: April 27, 2011

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One Riverfront Plaza, Suite 730
Newark, New Jersey 07102
(973) 848-7676
James S. Richter
Jeffrey P. Catenacci

*Attorneys for Defendant/Counterclaim Plaintiff
Watson Laboratories, Inc. – Florida*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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MALLINCKRODT INC.,	:	Honorable Faith S. Hochberg, U.S.D.J.
	:	
Plaintiff,	:	Civil Action No. 10 CV 6424 (FSH) (PS)
	:	
v.	:	
	:	
WATSON LABORATORIES, INC. –	:	DECLARATION OF JAMES F. HURST
FLORIDA,	:	IN SUPPORT OF APPLICATION FOR
	:	ADMISSION <i>PRO HAC VICE</i>
Defendant.	:	
	:	
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JAMES F. HURST, of full age, hereby declares as follows:

1. I am a member of Winston & Strawn LLP, attorneys for Defendant Watson Laboratories, Inc. – Florida (“Watson Labs”).
2. This Declaration is submitted in support of my application for admission *pro hac vice* in this matter.
3. I principally practice law in Winston & Strawn’s Chicago offices, which are located at 35 West Wacker Drive, Chicago, Illinois 60601. I received a B.S. degree from the University of Delaware in 1986 and a J.D. degree from the University of Pennsylvania Law

School in 1989. I am a member in good standing of the Bar of the State of Illinois and have been since my admission in 1989.

4. The office maintaining the roll of members for the Bar of the State of Illinois is the Attorney Registration & Disciplinary Commission of the Supreme Court of Illinois, One Prudential Plaza, 130 East Randolph Drive, Suite 1500, Chicago, Illinois 60601-6219.

5. I am a member in good standing of the Bar of the United States District Court for the Northern District of Illinois and have been since my admission in 1991.

6. The office maintaining the roll of members for the United States District Court for the Northern District of Illinois is the Clerk's Office, United States District Court, Northern District of Illinois, Attorney Admissions, 219 S. Dearborn Street, Room 2050, Chicago, Illinois 60604.

7. I am a member in good standing of the Bar of the United States District Court for the Eastern District of Texas and have been since my admission in 2007.

8. The office maintaining the roll of members for the United States District Court for the Eastern District of Texas is the Attorney Admissions Clerk, United States District Court, Eastern District of Texas, 300 Willow Street, Room 104, Beaumont, Texas 77701.

9. I am a member in good standing of the Bar of the United States Court of Appeals for the Seventh Circuit and have been since my admission in 1993.

10. The office maintaining the roll of members for the United States Court of Appeals for the Seventh Circuit is the Clerk, United States Court of Appeals for the Seventh Circuit, 219 S. Dearborn Street, Room 2722, Chicago, Illinois 60604.

11. I am a member in good standing of the Bar of the United States Court of Appeals for the Ninth Circuit and have been since my admission in 2007.

12. The office maintaining the roll of members for the United States Court of Appeals for the Ninth Circuit is the Clerk's Office, Attorney Admissions, United States Court of Appeals for the Ninth Circuit, P.O. Box 193939, San Francisco, California 94119-3939.

13. I am a member in good standing of the Bar of the United States Court of Appeals for the District of Columbia Circuit and have been since my admission in 1999.

14. The office maintaining the roll of members for the United States Court of Appeals for the District of Columbia Circuit is the Clerk's Office, United States Court of Appeals for the District of Columbia Circuit, 333 Constitution Avenue, NW, Room 5523, Washington, D.C. 20001-2866.

15. I am a member in good standing of the Bar of the United States Court of Appeals for the Federal Circuit and have been since my admission in 1993.

16. The office maintaining the roll of members for the United States Court of Appeals for the Federal Circuit is the Clerk of Court, United States Court of Appeals for the Federal Circuit, 717 Madison Place, NW, Washington, D.C. 20439.

17. I am a member in good standing of the Bar of the Supreme Court of the United States and have been since my admission in 2001.

18. The office maintaining the roll of members for the Supreme Court of United States is the Clerk, Admissions Office, Supreme Court of United States, 1 First Street, NE, Washington, D.C. 20543-0001.

19. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me, by any court in any jurisdiction.

20. I will be associated in this matter with James S. Richter, a member of Winston & Strawn's Newark, New Jersey office, who is a member in good standing of the Bar of the

Supreme Court of New Jersey and the Bar of the District Court of New Jersey, and other members of the New Jersey Bar and the Bar of the District of New Jersey who are employed in our Newark office.

21. Watson Labs has requested that I be involved as trial counsel in its representation in this matter.

22. There is good cause for my admission *pro hac vice* in that I have particular knowledge and expertise regarding Watson Labs' business and the facts and legal issues presented by this matter.

23. I have never been denied admission *pro hac vice* in any jurisdiction.

24. If admitted to practice before this Court *pro hac vice*, I will submit to this Court's jurisdiction for discipline and abide by *L. Civ. R. 101.1(c)*.

25. I will make a payment of \$150.00 pursuant to *L. Civ. R. 101(c)(3)* payable to the Clerk, U.S. District Court and will pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order.

26. Plaintiff's counsel has consented to my *pro hac vice* admission.

27. Consequently, I respectfully request that the Court grant my admission *pro hac vice*.

I hereby declare under penalty of perjury, that the foregoing statements made by me are true and correct.

Dated: April 27 2011



James F. Hurst